

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

08 CV 3558

ASHTON OPTICAL IMPORTS, INC. doing business as  
OSA INTERNATIONAL,

Civil Action No.

Plaintiff,

v.

PRESTIGE OPTICAL, INC.;  
VIOLET STERN; and, ANGELA STERN;

Defendant.



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**COMPLAINT**

Plaintiff, **Ashton Optical Imports, Inc.**, doing business as **OSA International**, by its attorneys, as and for its Complaint against Defendants, allege upon information and belief:

**THE PARTIES**

1. Plaintiff **Ashton Optical Imports, Inc.**, doing business as "**OSA International**" ("OSA") is a corporation organized and existing under the laws of the State of Arizona, with an office and place of business at 25 Brookline, Aliso Viejo, California 92656.

2 (a). Defendant Prestige Optical, Inc. is a New York corporation with offices a places of business at 78 Avenue U, Brooklyn, NY 11223 and 614 Avenue X, Brooklyn, NY 11235; is transacting and doing business within this judicial district under the assumed name "ABS-SUNGLASSES" and has committed the acts complained of herein in this judicial district.

2(b). Upon information and belief, defendant Violet Stern is an individual residing at 9281 Shore Road, Apt 428, Brooklyn, NY 11209, and is one of the conscience,

dominant and active forces behind the wrongful activities complained of herein of defendant Prestige Optical, Inc., which wrongful acts she has engaged in for the gain and benefit of defendant Prestige Optical, Inc. and for her own individual gain and benefit. Defendant Violet Stern is subject to the jurisdiction of this Court pursuant to the laws of this State and Rule 4 of the Federal Rules of Civil Procedure.

2(b). Upon information and belief, defendant Angela Stern is an individual with an office and place of business at 78 Avenue U, Brooklyn, NY 11223, and is one of the conscience, dominant and active forces behind the wrongful activities complained of herein of defendant Prestige Optical, Inc., which wrongful acts she has engaged in for the gain and benefit of defendant Prestige Optical, Inc. and for her own individual gain and benefit. Defendant Angela Stern is subject to the jurisdiction of this Court pursuant to the laws of this State and Rule 4 of the Federal Rules of Civil Procedure. Defendants Prestige Optical, Inc., Violet Stern, and Angela Stern will hereinafter be collectively referred to as "Defendant".

#### JURISDICTION

3. The first claim herein arises under the Copyright Laws of the United States, 17 U.S.C. §101 *et seq.*, the second claim herein arises under the Federal Trademark Act of 1946, 15 U.S.C. §1051 *et seq.* and, accordingly, subject matter jurisdiction for these claims is conferred on this Court by virtue of 17 U.S.C. §501 *et seq.* and 15 U.S.C. §1121, as well as 28 U.S.C. §1338 (a).

4. The third claim herein arises under the common law of and statutes of the State of New York and is a claim joined with substantial and related claims under the federal laws of the United States enumerated above and, accordingly, subject matter jurisdiction for this third claim is conferred on this Court by virtue of 38 U.S.C. §1338 (b) and the doctrine of pendent jurisdiction.

5. Venue is founded on 28 U.S.C. §1391 (b) and (c) and §1400 (a).

**COMMON ALLEGATIONS**

6. Non party Chrome Hearts LLC (“Chrome Hearts”), the licensor to plaintiff OSA for the CHROME HEARTS trademarks for eyewear, has been designing, manufacturing and selling artistically styled leather goods, apparel, jewelry and accessories all under the CHROME HEARTS trademark since at least as early as 1989. Pursuant to an exclusive license agreement, plaintiff OSA has been designing, manufacturing, distributing and selling eyewear under the CHROME HEARTS trademarks since 2001 (the “Chrome Hearts Eyewear”).

7. Chrome Hearts sells a wide variety of quality artistic products, including leather pants, leather jackets, leather vests, sterling silver, gold and platinum jewelry, including necklaces, bracelets, rings and wallet chains, belt buckles and a wide collection of other products, including one-of-a-kind furniture and such CHROME HEARTS-branded products have become quite popular in the luxury goods marketplace worldwide.

8. Chrome Hearts eyewear, produced and sold by plaintiff OSA, has similarly become quite popular in the luxury goods marketplace and earned a worldwide reputation for being the most creatively designed eyewear, both for its innovative manufacturing techniques (including laser-cut designs on many of its wood temple pieces, leather-clad frame sections and precious metal adornments) and its fashion forward eyewear frame designs.

9. Chrome Hearts eyewear can be seen on many of the world’s most visible celebrities and are sold worldwide in more than 500 of the most exclusive retail eyewear shops and specialty retail stores around the world.

10. Chrome Hearts eyewear has been praised and recognized in numerous articles appearing in both trade publications and publications directed to the general public around the world, including articles in the United States, Germany, Japan and France. These articles have acclaimed the high artistry, fashion and style of Chrome Hearts' eyewear designs and the uniqueness of these designs.

11. Plaintiff OSA sells Chrome Hearts eyewear only through authorized dealers.

12. Since 2002, Chrome Hearts' eyewear products have generated millions of dollars of sales yearly.

13. Each season plaintiff OSA arranges to have its seasonal collection of Chrome Hearts eyewear photographed to be used as an online marketing catalog accessible by its retail customers and the general public. Plaintiff OSA is the sole proprietor of all copyright rights in such eyewear pictures.

14. Among many other Copyright Registrations, OSA is the owner of the following Copyright Registrations for its marketing and advertising pictures of its Chrome Hearts eyewear (hereinafter the "Copyrighted Works").

<u>Title of Work</u>	<u>Registration Number</u>	<u>Registration Date</u>
2005 Season CHROME HEARTS Eyewear	TX 6-815-389	November 21, 2007
2006 Season CHROME HEARTS Eyewear	TX 6-815-445	November 21, 2007
2007 Season CHROME HEARTS Eyewear	TX 6-815-447	November 21, 2007

Copies of these Registration Certificates are annexed hereto and collectively identified as *Exhibit A*.

15. OSA has duly complied in all respects with the provisions of Title 17 of the United States Code, and has secured the rights and privileges under the copyright laws that are accorded to the eyewear pictures comprising the Copyrighted Works.

**Defendants' Infringing Activities**

**COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. §101 ET SEQ.**

15. As the owner of the Copyrighted Works, plaintiff OSA is entitled to exclusively use the Copyrighted Works without the unauthorized use by third parties. Given the access that the public had on the Internet to the Copyrighted Works, upon information and belief Defendant had easy access to the Copyrighted Works and the ability to easily copy same.

16. Upon information and belief, Defendant copied all or a portion of the Copyrighted Works and reproduced such copies on Defendant's Internet site <http://www.abs-sunglasses.com/> as a marketing and sales tool to offer Chrome Hearts eyewear for sale to the public. A copy of portions of Defendant's Internet site displaying Defendant's infringements of the Copyrighted Works is annexed hereto as *Exhibit B*. Defendant has intentionally, knowingly and willfully copied OSA's Copyrighted Works to be able to sell Chrome Hearts eyewear at significantly discounted prices through its' Internet site.

17. Upon information and belief, the aforesaid infringement by Defendant of plaintiff OSA's Copyrighted Works was and continues to be with the knowledge that such pictures are copyrighted and proprietary to plaintiff OSA and Defendant, in doing the acts complained of herein, has willfully infringed upon OSA's rights under the Copyright Laws of the United States, Title 17 U.S.C. §101, et seq.

## Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*

Register of Copyrights, United States of America

Registration Number:

TX 6-815-389

Effective date of registration:

November 21, 2007

### Title

Title of Work: Chrome Hearts Eyewear Catalog - Spring 2005

### Completion/ Publication

Year of Completion: 2005

Date of 1st Publication: September 1, 2005 Nation of 1st Publication: United States

### Author

Author: Ashton Optical Imports, Inc.

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Anonymous: No

Pseudonymous: No

### Copyright claimant

Copyright Claimant: Ashton Optical Imports, Inc.

25 Brookline, Aliso Viejo, CA, 92656-1461

### Limitation of copyright claim

Previously registered: No

### Certification

Name: Robert L. Tucker

Date: November 19, 2007

# Exhibit A

IPN#:

Registration #:

Service Request #: 1-23258557

Tucker & Latifi, LLP  
160 East 84th Street  
New York, NY 10028

## Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature in black ink that reads "Marybeth Peters".

Register of Copyrights, United States of America

Registration Number:

TX 6-815-445

Effective date of registration:

November 21, 2007

### Title

Title of Work: Chrome Hearts Eyewear Catalog - Spring 2006

### Completion/ Publication

Year of Completion: 2006

Date of 1st Publication: January 14, 2006

Nation of 1st Publication: United States

### Author

Author: Ashton Optical Imports, Inc.

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Anonymous: No

Pseudonymous: No

### Copyright claimant

Copyright Claimant: Ashton Optical Imports, Inc.

25 Brookline, Aliso Viejo, CA, 92656-1461

### Limitation of copyright claim

Material excluded from this claim: previous version of catalog

Previously registered: No

### Certification

Name: Robert L. Tucker

Date: November 19, 2007

Correspondence: Yes

**IPN#:**

**Registration #:**

**Service Request #:** 1-23209984

Tucker & Latifi, LLP  
160 East 84th Street  
New York, NY 10028

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Register of Copyrights, United States of America

Registration Number:

TX 6-815-447

Effective date of  
registration:

November 21, 2007

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### Title

**Title of Work:** Chrome Hearts Eyewear Catalog - Spring 2007

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### Completion/ Publication

**Year of Completion:** 2007

**Date of 1st Publication:** January 21, 2007

**Nation of 1st Publication:** United States

---

### Author

**Author:** Ashton Optical Imports, Inc.

**Work made for hire:** Yes

**Citizen of:** United States

**Domiciled in:** United States

**Anonymous:** No

**Pseudonymous:** No

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### Copyright claimant

**Copyright Claimant:** Ashton Optical Imports, Inc.

25 Brookline, Aliso Viejo, CA, 92656-1461

---

### Limitation of copyright claim

**Material excluded from this claim:** previous version of catalog

**Previously registered:** No

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### Certification

**Name:** Robert L. Tucker

**Date:** November 19, 2007

**Correspondence:** Yes

IPN#:

Registration #:

Service Request #: 1-23258432

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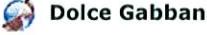
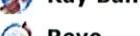
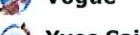
You may search for any color, brand, name, model # or partial info

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Search Result : 167 products, corresponding to your request

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Erected c.RB-J  
**Special price:**  
849.00Chrome Hearts Hit  
It c.DT  
**Special price:**  
409.00Chrome Hearts  
Hung c.SAP  
**Special price:**  
579.00Chrome Hearts  
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**Special price:**  
479.00Chrome Hearts  
Injected c.BK-P  
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479.00Chrome Hearts  
Jojo c.DB-LBL  
**Special price:**  
659.00Chrome Hearts  
Jojo c.GP-WTL  
**Special price:**  
659.00Chrome Hearts  
Little Classic Oval  
c.DB-LBL  
**Special price:**  
769.00Chrome Hearts  
Little Classic Oval  
c.SS-BKL  
**Special price:**  
769.00Chrome Hearts  
Little Classic Oval  
c.SS-CML  
**Special price:**  
769.00Chrome Hearts  
Little Classic Oval  
c.SS-IRL  
**Special price:**  
769.00Chrome Hearts  
Little Red Riot  
c.DB-BRL  
**Special price:**  
529.00Chrome Hearts  
Classic Oval  
c.SS-BKL  
**Special price:**  
549.00Chrome Hearts  
Disfunctional  
c.BK-PK-BKL-CH  
**Special price:**  
849.00Chrome Hearts  
Elixer c.BK  
**Special price:**  
529.00Chrome Hearts  
Elixer c.BKS  
**Special price:**  
529.00Chrome Hearts  
Elixer c.BS  
**Special price:**  
529.00Chrome Hearts  
Elixer c.BT  
**Special price:**  
529.00

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**Exhibit B**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

ASHTON OPTICAL IMPORTS, INC. doing business as  
OSA INTERNATIONAL,

Civil Action No.

Plaintiff,

v.

PRESTIGE OPTICAL, INC.;  
VIOLET STERN; and, ANGELA STERN;

Defendant.

---

**COMPLAINT**

**Tucker & Latifi, LLP**  
*Counsel for the Plaintiffs*  
160 East 84<sup>th</sup> Street  
New York, NY 10028  
(212) 472-6262

18. Defendant's infringement of plaintiff OSA's Copyrighted Works is to the great and irreparable damage of plaintiff OSA, and plaintiff is informed and believes that Defendants will continue such infringing activities unless enjoined by this Court.

19. Plaintiff have no adequate remedy at law and have suffered irreparable damage as a result of Defendant's acts as aforesaid in an amount thus far not determined, but believed to be in excess of Seven Hundred Thousand Dollars (\$700,000).

**FEDERAL UNFAIR COMPETITION**

20. Plaintiff repeats and realleges every allegation contained in paragraphs 1 through 16 and 18 as though fully set forth herein.

21. This claim arises under the provision of the Trademark Act of 1946, 15 U.S.C. 1051, et seq., particularly under 15 U.S.C. 1125(a) and alleges the use in commerce of a false designation of origin and false or misleading description of fact and false or misleading representation of fact.

22. By reason of the marketing, celebrity status and unsolicited press coverage generated by CHROME HEARTS-branded eyewear at the trade and consumer levels, and the unique quality of the products comprising the entire lines of plaintiff OSA's products, these products are recognized by the trade and consumers as being products emanating from OSA as the exclusive eyewear licensee of Chrome Hearts.

23. Defendant, with knowledge of the widespread recognition of Chrome Hearts

eyewear among the relevant segment of the market and with the specific intent to exploit that recognition, has undertaken to copy plaintiff OSA's Copyrighted Works to sell discounted Chrome Hearts eyewear products without the benefit of the warranty and after sales service that OSA provides for such products. It is the intentions of the Defendant to have its ultimate purchasers believe that they are an authorized source for Chrome Hearts eyewear and that purchasing such products from Defendant will accord the purchaser all the benefits of purchasing such eyewear from one of OSA's authorized retailers.

24. By reason of Defendant's sales techniques using infringements of the Copyrighted Works, the public has been and is being mislead as to the nature and quality of the service and warranty that accompany the Chrome Hearts eyewear sold by Defendant, in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1051.

25. By reason of the foregoing, Defendant has used in commerce, on or in connection with goods and/or services, a false designation of origin, a false or misleading description of fact or false or misleading representation of fact, including words, terms, names, devices and symbols or a combination thereof which is likely to cause confusion, or mistake, or to deceive as to the affiliation, connection, or association of Defendant with plaintiff OSA with full knowledge of the falsity of such designations of origin or such descriptions or representations, all to the detriment of plaintiff OSA.

26. Plaintiff has no adequate remedy at law and has suffered irreparable damage as a result of Defendant's acts as aforesaid in an amount thus far not determined, but believed to be in excess of Seven Hundred Thousand Dollars (\$700,000).

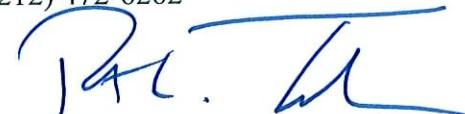
**WHEREFORE**, Plaintiff OSA demands:

- A. that Defendant, its officers, agents, employees, attorneys and all persons acting in concert, participation or combination with Defendant, be preliminarily and permanently enjoined from infringing upon plaintiff OSA's Copyrighted Works;
- B. that Defendant, its officers, agents, employees, attorneys and all persons acting in concert, participation or combination with Defendant, be preliminary and permanently enjoined from competing unfairly with the plaintiff OSA, from falsely representing and falsely designating the origin of Defendant's Chrome Hearts eyewear and from engaging in false advertising;
- C. that Defendant be required to pay to the plaintiff damages in a sum to be determined at trial and to account for all gains, profits and advantages derived by Defendant by the use of copies of the Copyrighted Works;
- D. that plaintiff be awarded statutory damages by reason of the infringement of plaintiff OSA's Copyrighted Works;
- E. that plaintiff be awarded treble damages, punitive damages, reasonable attorneys' fees and the costs and disbursements of this action;
- F. that plaintiff be granted an award of punitive damages in view of the willful and malicious nature of Defendant's tortious acts; and,
- G. that plaintiff have such other and further relief as the Court deems just and equitable.

Dated: New York, New York  
April 11, 2008

Respectfully submitted,

TUCKER & LATIFI, LLP  
*Attorneys for Plaintiff*  
160 East 84<sup>th</sup> Street  
New York, NY 10028  
(212) 472-6262

  
Robert L. Tucker (RLT 1027)

## Certificate of Registration



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*Marybeth Peters*

Register of Copyrights, United States of America

Registration Number:

TX 6-815-389

Effective date of registration:

November 21, 2007

### Title

Title of Work: Chrome Hearts Eyewear Catalog - Spring 2005

### Completion/ Publication

Year of Completion: 2005

Date of 1st Publication: September 1, 2005 Nation of 1st Publication: United States

### Author

Author: Ashton Optical Imports, Inc.

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Anonymous: No

Pseudonymous: No

### Copyright claimant

Copyright Claimant: Ashton Optical Imports, Inc.

25 Brookline, Aliso Viejo, CA, 92656-1461

### Limitation of copyright claim

Previously registered: No

### Certification

Name: Robert L. Tucker

Date: November 19, 2007

# Exhibit A

IPN#:

Registration #:

Service Request #: 1-23258557

Tucker & Latifi, LLP  
160 East 84th Street  
New York, NY 10028

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Registration Number:

TX 6-815-445

Effective date of registration:

November 21, 2007

### Title

Title of Work: Chrome Hearts Eyewear Catalog - Spring 2006

### Completion/ Publication

Year of Completion: 2006

Date of 1st Publication: January 14, 2006

Nation of 1st Publication: United States

### Author

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Anonymous: No

Pseudonymous: No

### Copyright claimant

Copyright Claimant: Ashton Optical Imports, Inc.

25 Brookline, Aliso Viejo, CA, 92656-1461

### Limitation of copyright claim

Material excluded from this claim: previous version of catalog

Previously registered: No

### Certification

Name: Robert L. Tucker

Date: November 19, 2007

Correspondence: Yes

**IPN#:**

**Registration #:**

**Service Request #:** 1-23209984

Tucker & Latifi, LLP  
160 East 84th Street  
New York, NY 10028

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TX 6-815-447

Effective date of  
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November 21, 2007

### Title

**Title of Work:** Chrome Hearts Eyewear Catalog - Spring 2007

### Completion/ Publication

**Year of Completion:** 2007

**Date of 1st Publication:** January 21, 2007

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### Author

**Author:** Ashton Optical Imports, Inc.

**Work made for hire:** Yes

**Citizen of:** United States

**Domiciled in:** United States

**Anonymous:** No

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### Copyright claimant

**Copyright Claimant:** Ashton Optical Imports, Inc.

25 Brookline, Aliso Viejo, CA, 92656-1461

### Limitation of copyright claim

**Material excluded from this claim:** previous version of catalog

**Previously registered:** No

### Certification

**Name:** Robert L. Tucker

**Date:** November 19, 2007

**Correspondence:** Yes

IPN#:

Registration #:

Service Request #: 1-23258432

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Erected c.RB-J  
**Special price:**  
849.00Chrome Hearts Hit  
It c.DT  
**Special price:**  
409.00Chrome Hearts  
Hung c.SAP  
**Special price:**  
579.00Chrome Hearts  
Injected c.T-KP  
**Special price:**  
479.00Chrome Hearts  
Injected c.BK-P  
**Special price:**  
479.00Chrome Hearts  
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**Special price:**  
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Little Classic Oval  
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769.00Chrome Hearts  
Little Classic Oval  
c.SS-IRL  
**Special price:**  
769.00Chrome Hearts  
Little Red Riot  
c.DB-BRL  
**Special price:**  
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Classic Oval  
c.SS-BKL  
**Special price:**  
549.00Chrome Hearts  
Disfunctional  
c.BK-PK-BKL-CH  
**Special price:**  
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Elixer c.BK  
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Elixer c.BKS  
**Special price:**  
529.00Chrome Hearts  
Elixer c.BS  
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**Special price:**  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ASHTON OPTICAL IMPORTS, INC. doing business as  
OSA INTERNATIONAL,

Civil Action No.

Plaintiff,

v.

PRESTIGE OPTICAL, INC.;  
VIOLET STERN; and, ANGELA STERN;

Defendant.

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**COMPLAINT**

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